



June 2007

Information Request Questions: Insurance Coverage – Insurers

1. Provide copies of all casualty, liability and/or pollution insurance policies issued by Respondent (or Respondent's predecessors) to [PRP] from [first site operations date] to present, including but not limited to comprehensive general liability, primary, umbrella and excess policies, as well as any environmental impairment liability or pollution legal liability insurance.
2. If there are any casualty, liability and/or pollution insurance policies issued by Respondent (or Respondent's predecessors) to [PRP] from [first site operations date] to present of which you have any evidence, or of which you are aware, but neither possess copies, nor are able to obtain copies, identify each such policy to the best of your ability by identifying:
 - a. The name and address of each insurer and of the insured;
 - b. The type of policy and policy numbers;
 - c. The per occurrence or per accident policy limits of each policy;
 - d. Whether each such policy is "primary" or "excess"; and
 - e. The commencement and expiration dates of such policy.
3. To the extent not identified in Questions 1 or 2 above, provide all other evidence of casualty, liability and/or pollution insurance issued to [PRP] from [first site operations date] to present.
4. For each policy of insurance identified in Questions 1, 2 or 3 above, provide all underwriting files, claim files, loss control files, and premium audits, as well as any accounting records including retrospective rating adjustments, for each such policy.
5. Provide all documents and files that constitute, evidence, refer, or relate to claims made by [PRP] under any of the policies identified in Questions 1, 2 or 3.
6. Identify all previous settlements by Respondent (or Respondent's predecessors) with [PRP] which relate in any way to environmental liabilities and/or to casualty, liability and/or pollution insurance coverage, including :
 - a. The date of the settlement;
 - b. The scope of release provided under such settlement; and
 - c. The amount of money paid by Respondent pursuant to such settlement.Provide copies of all such settlement agreements.
7. Identify all insurance agencies or brokerage firms that placed any casualty, liability and/or pollution insurance policies issued by Respondent (or Respondent's predecessors) to [PRP] from [first site operations date] to present. Include the name, address, telephone number and time period when the agency placed insurance on behalf of the Respondent as well as the name and current whereabouts, if known, of individuals at the agency or brokerage firm with whom the Respondent communicated and the nature of the communication. If the Respondent believes no agency or brokerage firm was used to place casualty and/or liability and/or environmental insurance on behalf of [PRP], provide an explanation of how such insurance was placed.